

From: Gorin.Jonathan@epamail.epa.gov
To: [David McNichol](#); [McGowan, Carrie](#)
Subject: Lora Smith's comments
Date: Thursday, September 27, 2012 4:31:41 PM
Attachments: [LS_ditch_comments.docx](#)
[Lora's_FSmodscomments_092612.docx](#)

To: "David McNichol" <DMcNichol@ashland.com>, "McGowan, Carrie" <CMcGowan@ashland.com>

Dave, Carrie Lora just sent me some comments on the additional language for the off-property ditches.

So, here are her comments on the FS proposed changes as well as the new language for the ditch (as it appears in the Dec 2011 RI version). If any of these are going to cause big issues, please let me know so we can discuss before i send them final.

Still waiting on Diana/Van Eck.

jon

*(See attached file: LS_ditch_comments.docx)(See attached file:
Lora's_FSmodscomments_092612.docx)*



U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION II

Emergency and Remedial Response Division
290 Broadway, 18th Floor
New York, New York 10007-1866

MEMORANDUM

TO: Jon Gorin, RPM
ERRD/NJRB/SNJRS

FROM: Lora M. Smith, Risk Assessor
ERRD/PSB/TSS

DATE: September 27, 2012

RE: **Draft Remedial Investigation Report (modified)**
LCP Chemicals, Inc. Superfund Site, Linden, NJ
December 2011

I have reviewed the above referenced modified report and offer the following comments:

1. Page 5-9, Section 5.3.2.1, 1st paragraph, last sentence: The specific location of the downstream culvert outfall is unknown..." At some point, perhaps during design, we will need to locate the outfall of the Northern Off-Site Ditch.
2. Page 6-23, Section 6.5.2, 2nd paragraph, last sentence: For human health screening purposes, please use unfiltered samples.
3. Page 6-24, Section 6.6, 5th paragraph, 1st sentence: While no promulgated standards exist for sediment, EPA commonly uses soil screening values as a surrogate for sediment. Please screen sediment against soil RSLs in addition to ecological ER-L and ER-M values.
4. Figures 5-21 and 5-22: Please indicate units for the y-axis (Water elevation). It is assumed that they are feet.

/LMS

cc: Diana Cutt
Mindy Pensak
Ben Conetta



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290 Broadway, 18th Floor
New York, New York 10007-1866

MEMORANDUM

TO: Jon Gorin, Remedial Project Manager
ERRD/NJRB/SNJRS

FROM: Lora M. Smith, Risk Assessor
ERRD/PSB/TSS

DATE: September 26, 2012

**RE: Draft Feasibility Study modifications
LCP Chemicals, Inc. Superfund Site
Linden, New Jersey
August 2012**

I have reviewed the above referenced modifications and offer the following comments:

General Comments:

1. EPA expects that our previous comments drafted in March 2012 will be incorporated into the remainder of the FS document.
2. Please include page numbers in the final FS.

Specific Comments:

1. PTW edits, page 3 modification: The 2nd to last sentence is unclear. A PTW is a PTW regardless of depth or exposure potential. The concern with PTW is that it acts as a source. Please omit this sentence.
2. COPCs: The list of COPCs does not include all COPCs carried through the HHRA (RAGS Part D, Table 10s). Please ensure that ALL identified COPCs from the risk assessments are included as COPCs in the FS, unless justification can be provided to support that a contaminant is not site-related. Additionally, arsenic in sediment also posed an unacceptable human health risk.
3. PRGs, Note 3: "IGW values provided for information only." Why are IGW values not

considered for PRGs? Justification must be provided on a chemical by chemical basis.

/LMS

cc: Diana Cutt
Ben Conetta